

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Civil Action No. 2:23-cv-00352-JRG-RSP

**CORRECTED JOINT MOTION TO ADJUST RESPONSE AND REPLY DEADLINES
FOR PENDING AND FORTHCOMING MOTIONS**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group, Inc. (collectively, “Verizon”), (collectively, the “Parties”), respectfully file this Joint Motion to Adjust the Response and Reply Deadlines for Pending and Forthcoming Motions and would show the Court as follows:

The current deadlines for Headwater to respond to Verizon’s Motion for Sanctions Under FRCP 37(e)(1) (Dkt. 164) is April 2, 2025. At this time, the Parties request a brief adjustment of the briefing schedule and request an extension of Headwater’s response deadline to April 8, 2025 to extend Verizon’s reply deadline to April 21, 2025.

Additionally, the current deadline for Verizon to reply to any of its forthcoming motions for summary judgment and motions to strike expert testimony, including *Daubert* motions, is April 23, 2025. At this time, the Parties request a brief extension of the due date of Verizon’s replies to April 30, 2025.

The Parties request a brief extension of the above deadlines to align the briefing schedules

of the Motions for Sanctions and to avoid unnecessary conflicts between the briefing schedules for the Motions for Sanctions and the forthcoming dispositive motions and motions to strike expert testimony.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have corresponded and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

Dated: March 31, 2025

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CERTIFICATE OF CONFERENCE

I hereby certify that, on March 28, 2025, counsel for Verizon conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Josh A. Krevitt
Josh A. Krevitt

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Josh A. Krevitt
Josh A. Krevitt